

OMB Questions for the Office of Research and Development

Examiner Rosenfield

OMB-FY2019ORD-0005 (Addressing the IRIS MYA)

OMB Question #5: *The creation of the Multiyear Agenda (MYA) in late 2015 supported and was in response to GAO's/NRC's recommendations for more programmatic transparency and the prioritization of work. But in re-evaluating that agenda as it relates to other emergency (or non-emergency) needs from the various EPA program offices and other stakeholders in the upcoming year, would that process undermine the work already performed in the creation of the MYA? Would GAO/NRC see this as a step back from the MYA and therefore less transparent and more confusing to the stakeholder community?*

ORD Answer:

We are not stepping back from the MYA; rather, we are simply reaffirming partner needs and the commitment of partners to these priorities, in particular in light of the new priorities of the Administrator. In certain cases, we are seeing indications that existing MYA analyses may not align with the current Administrator's priorities. We are also working to incorporate priorities of the states, where appropriate.

In addition, other events have occurred since the MYA that have impacted how MYA recommendations can be implemented going forward:

- When the MYA was developed, many of the “legacy” or older but ongoing assessments were left off of the agenda, assuming the work would be continued. This approach makes it difficult to programmatically manage the resources and direction of activities. The IRIS workflow will be updated to reflect these commitments, such as ethylbenzene, naphthalene, PCBs, chromium, and PAHs.
- Given the proposed Human Health Risk Assessment (HHRA) and IRIS program budget reductions, and staffing changes due to workforce attrition and mission critical details to support TSCA and OLEM activities, IRIS needs the ability to reevaluate priorities appropriately. Similarly, if HHRA and IRIS budget and staff resources increased, priorities would be shifted to address a larger number of assessments.
 - In light of NCEA's portfolio approach, in some instances, assessments conducted by other governmental agencies could be used as a starting point for an IRIS assessment. This new approach might also impact the priorities or our ability to resource those priorities. Again, it would be appropriate for us to communicate such opportunities to EPA programs/regions. IRIS is currently exploring how these approaches might be implemented. For example, the recently released nitrate/nitrite IRIS draft assessment plan proposes to use the 2017 ATSDR toxicological profile to identify relevant studies and prioritize health endpoints for an IRIS systematic review. ATSDR Toxicological Profiles are not conducted using systematic review approaches, which limits our ability to use them off the shelf for IRIS purposes; however, they can be very helpful to highlight priority outcomes and key science considerations.

Finally, the transparency of the existing MYA might be outweighed by our inability to meet its commitments due to changing resources and Agency priorities year to year. Our goal, moving forward, is to be successful at transparency and at the ability to deliver on our promises. In past recommendations, GAO has encouraged annual publication of the IRIS agenda. Our efforts to

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reaffirm partner needs annually, and make that information public, is consistent with GAO's concerns about transparency and ensuring IRIS users, stakeholders, and the public have access to the most up-to-date information about IRIS Program activities. In FY 2017, the SAB and the SAB-CAAC both agreed that a more pragmatic approach is needed. We look forward to the opportunity to demonstrate our approaches to the NRC and GAO for their evaluation.